

ORIGINAL

**BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268**

RECEIVED

JAN 22 4 15 PM '99

EX-111

Mailing Online Services

)
)
)
Docket No. MC98-1

**PITNEY BOWES INTERROGATORIES
TO USPS WITNESS LIM
(PB/USPS-ST-9-1-2)**

Pursuant to Sections 25 and 26 of the Commission's Rules of Practice, Pitney Bowes Inc. ("PB") hereby propounds the attached interrogatories and requests for the production of documents. The instructions for responding contained in the First Set of Interrogatories of Pitney Bowes Inc. to USPS Witness Plunkett are incorporated by reference.

Respectfully submitted,



Ian D. Volner
N. Frank Wiggins
Venable, Baetjer, Howard & Civiletti, LLP
1201 New York Avenue, NW
Washington, DC 20005
(202) 962-4800

Aubrey M. Daniel III
Carolyn H. Williams
Williams & Connolly
725 12th Street, NW
Washington, DC 20005

Counsel to Pitney Bowes Inc.

DC1:87608



PB/USPS- ST-9-1

At some places in the calculation of MOL extended costs in Exhibits A-G to your testimony a ratio of less than 100% is applied (e.g., Exhibit B, line 31). Please explain how each of the ratios of less than 100% was derived and produce all work papers calculating or displaying those ratios.

PB/USPS-ST-9-2

A comparison of the total information technology costs displayed in Tables 1, 2 and 5 of your testimony with the sum of one-time and variable information system costs reported in Tables 14 and 15 (as revised July 23, 1998) to Mr. Seckar's testimony shows an increase in information service costs from \$5,874,836 to \$22,507,966. Please confirm that these are comparable numbers. If you can not confirm, please explain why not. Please describe all changes in the operation of the MOL offering that resulted in this cost change.

CERTIFICATE OF SERVICE

I hereby certify that I have on this date served this document upon all participants of record in this proceeding in accordance with section 12 of the rules of practice.

DATE: January 22 1998

Ian D. Volner FW
Ian D. Volner